

2/18/2019

Advocacy Center Mail - Visit List and Attorney-Client Relationships



Melanie Bray <mbray@advocacyla.org>

Visit List and Attorney-Client Relationships

Randal J. Robert <RANDY@kswb.com>

Fri, Feb 15, 2019 at 3:08 PM

To: Jonathan Trunnell <jtrunnell@advocacyla.org>, "Keith J. Fernandez" <Keith@kswb.com>, George Holmes <George@kswb.com>, "Connell L. Archey" <CONNELL@kswb.com>, Jonathan Vining <JVining@corrections.state.la.us>, "collierma@ag.louisiana.gov" <collierma@ag.louisiana.gov>

Cc: Melanie Cleveland <mbray@advocacyla.org>, Ronald Lospennato <rlospennato@advocacyla.org>, Sarah Voigt <svoigt@advocacyla.org>, Katie Schwartzmann <kschwartzmann@laaclu.org>, Bruce Hamilton <bhamilton@laaclu.org>

Jonathan:

Thank you for your email. We note that your purported list of clients exceed 300 offenders and is basically, with few exceptions, a list of everyone who is or has been in extended lockdown at DWCC. We do not view this as a good faith effort to identify your clients. Instead, it appears to be nothing more than a restatement of your prior position that you represent the entire putative class by simply providing us with all of their names and asserting attorney-client privilege. In fact, if all of these individuals are in fact your clients, we don't understand why we have not spent months working toward a class certification hearing and/or why you recently filed a motion to amend to name the advocacy center as a plaintiff. You could have simply covered the field by naming all of these "clients" as parties to the litigation in the first instance. Your failure to do so makes us question whether such a relationship actually exists.

With that said, I have discussed the matter with my clients and we will agree to allow you to meet with the individuals listed below when you are in Shreveport next week. We are agreeing to do so in a good faith effort to allow you limited access while either we or the court resolves the current stalemate regarding access to these witnesses for investigation of the claims in this matter. We note that our agreement to allow you access on this limited basis should not be viewed as an agreement by defendants that any of these individuals (except the named plaintiffs) are in fact your clients, nor should it be viewed as an agreement on our part to grant future access pending resolution of the motions before the court.

Please be advised that access will be given to meet with the individuals listed below on Friday, 2/22. We cannot accommodate your request to meet on Tuesday.

Again, we reiterate our offer made during the meet and confer conference yesterday. We will agree to allow you reasonable access to meet with putative class members if you will agree to allow us reciprocal access to properly investigate these claims.

Regards - Randy

From:
Randal J. Robert
Kantrow Spaht Weaver and Blitzer (APLC)
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